

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 108

1 that Steve Washburn, the investigator?

2 A Yes, sir.

3 Q And did they make copies of pages from your  
4 calendar?

5 A I'm not real sure. I know they looked at it.

6 Q And you took it back home.

7 What did you do with it?

8 A I don't know. I don't have any idea if I  
9 kept it, I threw it away, or what, because -- I just  
10 don't know.

11 Q Well, other than possibly you calling Dr.  
12 Kula's office on November 8th, did you have any other  
13 contact with Dr. Kula or his office from October 27th  
14 until your next apparent visit on November 21st?

15 A No, sir.

16 Q Dr. Kula noted in the October 27th, 2000,  
17 chart note that when you had opportunities to be  
18 intimate with your husband, that you turned them down  
19 out of resentment for him.

20 Did you tell that to Dr. Kula?

21 A No, sir.

22 Q So did that ever happen, where you turned  
23 down opportunities with your husband to be intimate  
24 with him?

25 A Yes, sir.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 125

1 Q She didn't say anything else?

2 A No. I'm sorry.

3 Q She didn't give you any kind of advice?

4 A No. She just listened.

5 Q Okay. Let's get back to this November 21st,  
6 2000, session. You've told me a lot of things that Dr.  
7 Kula said to you.

8 Anything else you remember him saying to you?

9 A Just that I needed to have an affair and it  
10 would improve my marriage.

11 Q Okay. Was there any physical contact between  
12 you and Dr. Kula on November 21st?

13 A Yes, there was.

14 Q Tell me about that.

15 A At the end of the session, he was in his  
16 chair and he said that the session was over. I was  
17 fixing to get up off the couch. He come over and sat  
18 beside me.

19 Q Was this an hour-long session that day?

20 A Yes, sir.

21 Anyway, he sat beside me and he wrapped his  
22 arm around me and he kissed me.

23 Q So which side was he sitting on? Your right  
24 or your left?

25 A Well, I was sitting like this -- sideways,

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 126

1 like this. So he was sitting right here. (Indicating)

2 Q Okay. So he was in his chair?

3 A No. He was on the love seat.

4 Q Okay. I'm a little bit confused.

5 A Okay. When I sit down, I sit like this.

6 Okay? The love seat is this way and he sits right  
7 here. (Indicating)

8 Q You're sitting --

9 A With Charles being this way.

10 Q You're on the end of the love seat?

11 A Yeah.

12 Q Sitting kind of --

13 A I just sit like this, because his desk is  
14 kind of like this and you have to sit like this in  
15 order to see him. (Indicating)

16 Q Okay. I understand what you're saying, but  
17 it won't show up on the transcript when you say "like  
18 this."

19 A Oh, okay. I put my leg up under my rear. I  
20 double it back because my feet get cold.

21 Q Right.

22 A So I sit on my feet.

23 Q But you weren't facing the normal way someone  
24 would sit on a love seat. You were facing sideways.

25 Is that what you're saying?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 127

1 A Diagonal. I was facing diagonal.

2 Q Okay. And he comes in and sits down on your  
3 left or on your right?

4 A On my right.

5 Q Okay. So --

6 A He sat down on my right.

7 Q He would be -- he'd just sit like a normal  
8 person would sit down on the love seat?

9 A Right.

10 Q Okay.

11 A Okay. He wrapped --

12 Q So his left hand would be towards you?

13 A Right. Around me.

14 Q So he put his left hand around you?

15 A Around me. And he brought me to him and he  
16 give me a kiss and I kissed him back.

17 Q Did you put your arms around him?

18 A I don't remember. I really -- I don't  
19 remember whether I did that then or not.

20 Q But you're sitting on your knees?

21 A Sitting with my foot under my hiney.

22 Okay. Then -- let me turn back around so I  
23 can -- okay.

24 He kissed me. Okay. He runs his hand up my  
25 shirt --

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 128

1 Q What kind of clothes were you wearing that  
2 day?

3 A T-shirt and pants.

4 Q Just a regular T-shirt?

5 A Yeah. Just...

6 Q So he puts his hand under your T-shirt?

7 A Yes.

8 Q Okay. Tell me what he did.

9 A He raised my bra up over my breasts and then  
10 he put his mouth -- then he put his mouth on my  
11 nipples.

12 MR. McMILLIN: Do you want to take a  
13 break?

14 THE WITNESS: I just want to get it over  
15 with.

16 And then he sucked on my nipples.

17 Q (By Mr. McMillin) How long did this go on?

18 A Just -- it seemed just like that. And then I  
19 didn't realize he had undone his pants, pulled down his  
20 shorts --

21 Q So what was he wearing? Did he have a suit  
22 and tie on or --

23 A He just had on a suit -- a shirt with a tie,  
24 pair of pants.

25 Q So he pulled his pants down?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 129

1           A     I don't know when he did it. He -- I don't  
2 know when he undid his pants or anything. All I know  
3 is he sat down and the next thing I know, his penis is  
4 there --

5           Q     So when he --

6           A     -- just showing.

7           Q     -- first sits down on the couch, he had his  
8 pants on, didn't he?

9           A     Yeah. He's just showing. And then he  
10 touched it, he grabbed ahold of it, and he asked me if  
11 I thought it was long enough. I didn't know -- you  
12 know, I didn't say anything.

13          Q     Did you get up and leave or what did you do?

14          A     No. I just sat there like an idiot.

15          Q     What did you say to him?

16          A     Nothing.

17                He was -- then he asked me if I thought it  
18 was long enough to satisfy me and then he undid my  
19 pants.

20          Q     Are you still sitting down on the couch?

21          A     Yes.

22                And he tried to stick his hands down in my  
23 pants, but my pants were too tight.

24                So anyway, he told me I was attractive, and  
25 he just sat there, and he grabbed himself and he just

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 130

1 kind of shook it. And then --

2 Q Did you ever grab him?

3 A I don't remember. I honestly don't remember.

4 He wanted me to give him a blow job. He  
5 tried to get my head to go down and I wouldn't do it.

6 So anyway, he got up, did his pants up. I  
7 got up, fixed my bra. And then he took me in his arms,  
8 and he stuck his hand in my pants and stuck his finger  
9 up in me, for about that long. (Indicating)

10 Q When you say --

11 A About the snap of your fingers.

12 And then he told me to do my clothes up and  
13 we left. And he told me -- I'm sorry. We didn't leave  
14 right then.

15 He told me that if I needed him anytime, that  
16 all I had to do was call him and he would meet me and  
17 he wouldn't charge me -- if I was real depressed or if  
18 I was feeling really bad, to call him, and he wouldn't  
19 charge me.

20 And I told him, I said, "Well, if we do that,  
21 you could meet me at the baseball field." They've got  
22 a big old park there that's got a gazebo or whatever,  
23 and I said, "We could talk there."

24 So I left. I paid for my visit and left.

25 Q So when you left, there was somebody there to

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 131

1 take your money, I guess?

2 A Yeah.

3 Q Was that J.R.?

4 A I don't remember. I don't remember if it was  
5 her or not.

6 Q Somebody else was there?

7 A I don't know. I don't remember.

8 Q Well, you paid your money to somebody?

9 A Yeah.

10 Q And it wasn't Dr. Kula, was it?

11 A Huh-uh.

12 Q Is that no?

13 A "No." I'm sorry.

14 MR. WATTS: Off the record.

15 (Short break)

16 Q (By Mr. McMillin) When we broke, you were  
17 telling us about the encounter you had with Dr. Kula in  
18 his office on November 21st.

19 That romantic encounter you had with him was  
20 a mutual event between you and Dr. Kula?

21 A Yes, sir.

22 Q You didn't ever request that he stop or  
23 any --

24 A No.

25 Q -- anything of that nature, did you?



PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 132

1 A No, sir.

2 Q Did you say or do anything to Dr. Kula that  
3 led him to believe that you wanted to engage in a  
4 relationship with him?

5 A No, sir.

6 Q What were you thinking after you left Dr.  
7 Kula's office on November 21st?

8 A After something like that happens and you  
9 haven't been intimate in a long time, at that time it  
10 felt pretty exciting.

11 Q When did you next see or talk to Dr. Kula?

12 A It was on Sunday, after the 21st, I believe.

13 Q So that would be the 26th?

14 A I think so.

15 MR. WATTS: Don't guess, if you don't  
16 know.

17 THE WITNESS: Okay. I don't know, then.

18 Q (By Mr. McMillin) That's the day you claim  
19 you went to the motel with him?

20 A Oh. Yes, sir.

21 Q Okay.

22 A That's correct.

23 Q If we look at the motel receipt, that's  
24 11-26?

25 A 26. Yes, sir.

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 133

1 Q So between -- after you left his office on  
2 the 21st, until Sunday, November 26, you didn't talk to  
3 him or see him?

4 A No, sir.

5 Q Okay. And then on that Sunday, November  
6 26th, how did you make contact with Dr. Kula?

7 A I called his cell phone and --

8 Q Did he answer?

9 A I mean, I paged him. I'm sorry. I'm sorry.  
10 I paged him and he returned the call.

11 Q Okay. Were you at home --

12 A Yes, sir.

13 Q -- when you paged him, in Marietta?

14 A (Nods head)

15 Q Yes?

16 A I was at home in Marietta, yes, sir.

17 Q Was your husband at home?

18 A Yes, sir.

19 Q Okay. And what time of day was it that you  
20 paged Dr. Kula on 11-26?

21 A It was late morning.

22 Q What's your best estimate as to the  
23 approximate time?

24 A Just late morning. I don't --

25 Q Was it after 11:00 a.m.?

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 134

1 A Just late morning is all I can tell you.

2 Q Had you gone to church that day? What had  
3 you done that day?

4 A Nothing. I was just at home.

5 Q So you hadn't left your house that day --

6 A No.

7 Q -- before you paged him?

8 A Huh-uh. No.

9 Q Your husband wasn't working that day?

10 A No, sir, he was not working.

11 Q Your granddaughter was there at the house  
12 with you?

13 A Yes, sir.

14 Q Why was it that you paged Dr. Kula late  
15 morning on 11-26?

16 A I was feeling really depressed and I needed  
17 someone to talk to.

18 Q Why were you feeling really depressed?

19 A I don't really know. I really don't know.

20 Q No specific event had happened?

21 A No. Huh-uh.

22 Q Was that the first time you had ever paged  
23 Dr. Kula?

24 A Yes, sir.

25 Q And --

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 140

1 Q Tell me how the conversation went from there  
2 on.

3 A And I told him I was feeling really depressed  
4 and I wasn't feeling very well. And he told me to meet  
5 him at Motel 6.

6 Q So the only information you gave him was that  
7 you were feeling depressed, weren't feeling well?

8 A Yes.

9 Q First thing out of his mouth was, "Why don't  
10 you meet me at Motel 6"?

11 A Yes.

12 Q Anything else he said?

13 A He said, "Just meet me at Motel 6. Call me  
14 when you get checked in."

15 He did tell me to check in under my name,  
16 which I did. And he said call him back on his cell  
17 phone and tell him what room number I was in and then  
18 he would meet me there.

19 Q Had you ever been to Motel 6 before?

20 A No, sir.

21 Q Where is that located?

22 A On Holiday Drive, I think. It's out there by  
23 Holiday Inn --

24 Q Okay.

25 A -- in Ardmore.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 143

1 Q So did you know where the Motel 6 was  
2 located?

3 A Yes, sir.

4 Q So Dr. Kula called you back, and the only  
5 thing you remember him saying specifically is that he  
6 asked you to meet him at the Motel 6 and go ahead and  
7 get the room and put it under your name?

8 A Yes, sir.

9 Q Anything else he told you?

10 A Just to call him when I got there, and give  
11 him the room number, and he'd be there as soon as he  
12 could.

13 Q Why did you think he wanted you to get a  
14 motel room?

15 A You know, that's stupid on my part, because I  
16 really didn't know. But I quickly figured it out.

17 Q So you went and rented the motel room without  
18 knowing why he wanted you to get the motel room?

19 A Basically, at first, yes.

20 Q Did you bring any -- anything with you?  
21 Clothes or anything?

22 A Well, I always carry extra clothes in the  
23 back of my car. I have a bladder problem that is  
24 necessary for me to carry extra clothes with me at all  
25 times, and my daughter does too, and so we just keep an

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 148

1 Q You don't remember anything about the weather  
2 that day?

3 A No, I don't.

4 Q So is this a first-floor room that you got?

5 A Yes, sir.

6 Q You go check in.

7 And what did you do next?

8 A When I checked in, I went to the phone and I  
9 called Dr. Kula and I told him what room I was in. And  
10 he told me he would be there in a little while. And so  
11 I waited for him to get there.

12 Q Okay. So you went to Room 118 and you called  
13 Dr. Kula's cell phone; is that right?

14 A Yes, sir.

15 Q You didn't page him, you just called him on  
16 his cell phone?

17 A Yes, sir.

18 Q And he answered?

19 A Yes, sir.

20 Q And tell me exactly, the best you remember,  
21 what you told him.

22 A I told him that I was in Room 118. And he  
23 said he would be there as soon as he got through at the  
24 hospital, because he was on call that weekend. And  
25 that was all he said. And we said bye and hung up.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 149

1 Q Okay. Did he say anything else to you?

2 A No.

3 Q Didn't make any --

4 A Not that I remember.

5 Q Didn't make any requests of you?

6 A Oh. I apologize. Yes, he did. He wanted a  
7 bucket of ice and he wanted me to be nude when he got  
8 there.

9 Q So you call him, tell him, "I'm at Motel 6."  
10 And tell me what he says.

11 A Tell you what he said? He said that he  
12 needed a bucket of ice and for me to be nude when he  
13 got there.

14 Q So I take it at that point you knew what was  
15 going on -- what was getting ready to transpire at the  
16 Motel 6?

17 A Yes, I did.

18 Q When did you figure that out?

19 A When he said go to a motel.

20 Q Okay. So you -- when you were at your own  
21 house and he said go to a motel, you knew that there  
22 was going to be a sexual encounter at the motel?

23 A There would be some kind of encounter.

24 Q And that was your intention and desire, to  
25 get together with Dr. Kula and have some type of sexual

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 150

1 encounter at the motel?

2 A Yes.

3 Q So how long -- what time did Dr. Kula -- you  
4 checked in about 1:00.

5 About what time did he get there?

6 A I didn't watch the clock. All I know is,  
7 after he got his rounds done at the hospital, that he  
8 met me at the motel.

9 Q What did you do at the motel while you were  
10 waiting on him?

11 A I took a shower again and crawled in bed and  
12 watched TV.

13 Q Now, you'd just taken a shower before you  
14 left your house, so why in the world would you take  
15 another shower?

16 A I have OCD, obsessive-compulsive disorder.

17 Q So you frequently take multiple showers?

18 A Yes, I do.

19 Q So you took a shower and then what were you  
20 wearing? Just your T-shirt, you said?

21 A No. I was naked. I was laying in bed naked.

22 Q You didn't have any clothes on?

23 A No.

24 Q And then sometime thereafter, you don't know  
25 how long, Dr. Kula just knocks on the door?



PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 152

1 A Yes, sir.

2 Q What was in there?

3 A Bottle of Scotch.

4 Q What kind of Scotch was it?

5 A I don't know.

6 Q So had you gone to get ice before he got  
7 there?

8 A Yes.

9 Q There was just some plastic cups in the room?

10 A Yes.

11 Q And so you open the door, you're completely  
12 naked, and I guess he's clothed.

13 And what happened after that?

14 A He quickly undressed. Then he made himself a  
15 drink and then he pulled on his penis and then he went  
16 to the bathroom and then he got in bed with me.

17 Q Okay. So when you say he quickly undressed,  
18 did he just get completely nude as well?

19 A He sure did.

20 Q What was he wearing when he got over there?

21 A I don't remember the outer clothes. I  
22 remember his underwear. They were Tommy Hilfiger boxer  
23 type shorts with the elastic legs that clung to your  
24 legs. He wore what I call decorative socks. They  
25 weren't one color. They were several different colors,

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 153

1 with diamonds on them.

2 Mostly, I remember the underwear.

3 Q What color was the underwear?

4 A I don't remember what color they were then,  
5 but normally they were gray or white.

6 Q So you're saying he got undressed, fixed  
7 himself a drink, and then got in bed?

8 A Then he pulled on his penis, then he went to  
9 the bathroom, and he came back and got in bed and sat  
10 his glass of Scotch on the nightstand.

11 Q Did he drink it?

12 A Sure.

13 Q And what happened? Was the TV still on?

14 A Sure. Yes, sir.

15 Q What happened next?

16 A We kissed, we hugged, we talked, we had sex.  
17 He told me -- never mind.

18 Q What did he tell you?

19 MR. WATTS: Just answer his question.

20 THE WITNESS: I'm sorry.

21 He told me not to fall in love with him  
22 because he wasn't worth it.

23 Q (By Mr. McMillin) Was this after you had sex  
24 with him that he told you that?

25 A Yes.

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 154

1 Q Tell me everything else you remember Dr. Kula  
2 saying to you that day at the motel on 11-26.

3 A Well, I don't remember a lot about what we  
4 talked about. We talked about our kids. We talked  
5 about family. Not really a lot on that day, that I  
6 remember.

7 Q And you weren't at -- you were having a  
8 romantic, I guess you'd call it, fling with him that  
9 day at the motel? Is that basically the substance of  
10 it?

11 A If you want to call it that.

12 Q I mean, you weren't having any therapy  
13 sessions there at the motel with him, were you?

14 A Well, I guess that's his kind of therapy.

15 Q Well, my question is: He wasn't -- you and  
16 him weren't having a therapy session, like you would at  
17 his office, that day at the motel, were you?

18 A No.

19 Q Okay. That day at the motel, it was strictly  
20 a personal, sexual relationship?

21 A Yes.

22 Q Okay. And how long did Dr. Kula stay at the  
23 motel on November 26?

24 A He was there about two hours.

25 Q Any other specific things you remember him

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 159

1 A Right.

2 Q You could have been home by 3:00, you just  
3 don't remember?

4 A I just don't remember.

5 Q Okay. And was your husband home when you got  
6 back?

7 A Yes, sir, he was.

8 Q Did he ask you where you'd been?

9 A No, sir, he didn't.

10 Q What did he say to you?

11 A Nothing.

12 Q Did you say anything to him?

13 A No. Not -- the usual "Hi," you know.

14 Q Were you feeling bad that you just slept with  
15 another man, or what were you thinking?

16 A Well, it felt good to be held and to know  
17 that someone thought I was attractive, so I was feeling  
18 pretty good.

19 Q When is the next time that you talked to Dr.  
20 Kula after November 26th?

21 A I have no idea.

22 Q It looks like, according to his office  
23 records, the next office visit you had with him was on  
24 December 1st, 2000, which was a Friday.

25 Does that sound about right?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 160

1 A That sounds about -- yes, it does.

2 Q Do you know what time your appointment was  
3 that day?

4 A No, sir, I don't.

5 Q Did anything inappropriate or unusual happen  
6 during this session on December 1st, at his office?

7 A Just the kiss and the hug and he told me to  
8 get a motel room and he would be there after he saw his  
9 next patient.

10 Q So what time was your appointment over with  
11 on December 1st?

12 A I have no idea. I do not remember.

13 Q Morning or afternoon appointment?

14 A Normally morning.

15 Q Do you remember whether this was a morning  
16 appointment?

17 A This was a morning appointment.

18 Q Was it an hour-long appointment?

19 A Yes, sir.

20 Q So during this session on December 1st, did  
21 you and Dr. Kula discuss going to a motel previously?

22 A Repeat that, please.

23 Q On December 1st, 2000, did you and Dr. Kula  
24 discuss your recent encounter at the motel?

25 A No, sir.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 161

1 Q You didn't say anything to him about it?

2 A We did not discuss it.

3 Q You just had the normal therapy session with  
4 him?

5 A Yes, sir.

6 Q He was acting professional during the therapy  
7 session?

8 A Yes, sir. Until I got ready to leave.

9 Q Do you remember any of the things you  
10 discussed with Dr. Kula on December 1st?

11 A No, sir, I don't.

12 Q This was a -- was this a school day, Friday,  
13 December 1st?

14 A I don't remember whether it was or not.

15 Q You don't know whether you were off work that  
16 day?

17 A I don't remember.

18 Q If you were off work on Friday, December 1st,  
19 the school would have record of that?

20 A Sure.

21 Q What record would they have? Something that  
22 that secretary kept, that you told me about earlier?

23 A Yes.

24 Q Do you have any objection to us getting  
25 copies of your records from Greenville school system?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 171

1 Q Okay. So you were wearing your T-shirt and  
2 your underwear when he got there?

3 A Yes, sir.

4 Q And you don't have any idea what time he got  
5 there?

6 A None whatsoever.

7 Q And how long did he stay?

8 A He stayed about two hours.

9 Q Tell me what happened after Dr. Kula arrived  
10 on December 1st, at the motel.

11 A He came in the door, sat down in the chair,  
12 he undressed. He had his Tommy Hilfiger underwear on,  
13 as usual. He fixed himself a drink, he pulled on his  
14 penis again, went to the bathroom, and come back and  
15 got in bed with me.

16 Q Did he have the same black bag with him?

17 A Yes, he did.

18 Q And what happened after he got in bed with  
19 you?

20 A We had sex.

21 Q Okay. For how long did you have sex?

22 A Oh, I don't know. I didn't time us.

23 MS. COFFEY: Just answer the question.

24 Q (By Mr. McMillin) You don't know?

25 A I have no idea.

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 180

1 Q Dr. Kula -- did he wear a condom?

2 A No.

3 Q Did you ever have any concerns about any  
4 transmission of any sexual diseases or anything like  
5 that, sleeping with a man you barely know?

6 A I didn't think about it until later.

7 Q I take it you've never had any problems --  
8 you never ended up having any problems, did you?

9 A No. I haven't been tested, no.

10 Q Okay.

11 A So I don't know.

12 Q So you went to your appointment on December  
13 22nd. You said it was a typical appointment until you  
14 were getting ready to leave, and he hugged you again  
15 and you and him kissed like you had described before?

16 A Yes. Yes, sir.

17 Q Anything different?

18 A No. It was the same.

19 Q And did you suggest to him for him to meet  
20 you at a hotel that afternoon or that day?

21 A He suggested. He was the one that suggested  
22 the motels.

23 Q Okay. When did he suggest the motel on  
24 December 22nd?

25 A I don't remember.



PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 181

1 Q So did you go directly from his office to the  
2 motel?

3 A Yes, sir.

4 Q And how long was the session at his office on  
5 December 22nd? Was it an hour session?

6 A I don't know. Most of them were an hour.

7 Q Any of them last more than an hour?

8 A No.

9 Q Okay. So after the session on December 22nd,  
10 you drove directly to Motel 6 and got a room?

11 A Yes, sir.

12 Q And paid cash for the room?

13 A Yes, sir.

14 Q Did you stay in the same room, Room 118?

15 A Yes, sir. No. I just don't -- I don't  
16 remember. On December 22nd, I don't remember.

17 Q Are you sure you went to the Motel 6 on  
18 December 22nd?

19 A At one point we went to Days Inn. I don't  
20 remember the date that we did go to Days Inn, but we  
21 did go to Days Inn.

22 Q So if the hotel receipt you have shows Days  
23 Inn on December 22nd, that's the motel you went to?

24 A Yes, sir.

25 Q Why did you change motels?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 182

1 A We were afraid of getting caught.

2 Q Why is that?

3 A Well, we didn't want our spouses to find out  
4 that we were having an affair.

5 Q Well, how would you be able to keep it more  
6 secret at the Days Inn, rather than the Motel 6?

7 A To keep from continuing to go back to the  
8 same motel, switch motels, and -- you know, so we  
9 wouldn't get caught.

10 Q Whose idea was it to switch motels?

11 A It was mine.

12 Q So did you tell Dr. Kula, before you left  
13 your session on December 22nd, that you were going to  
14 get a room at the Days Inn this time, instead of the  
15 Motel 6?

16 A We had arranged to meet at Motel 8, instead  
17 of Days Inn. I got them confused.

18 Q Is there a Motel 8, or you mean 6?

19 A No. Motel 8. There was a Motel 8 right next  
20 to Days Inn at Ardmore. There's not anymore, though.

21 Q Okay. So in Ardmore, there used to be a  
22 Motel 6 and a Motel 8?

23 A Right.

24 Q Okay. So you told Dr. Kula that you were  
25 going to get a room at the Motel 8?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 190

1 A T-shirt and panties.

2 Q Okay. You said he was angry.

3 What made you think he was angry when he got  
4 there?

5 A Because he walked in the door and he told me  
6 to get my motels straight; that it better not happen  
7 again.

8 Q What else did he say?

9 A That was all. He stay -- he undressed. 45  
10 minutes later, he left.

11 Q Okay. So on December 22nd, he didn't stay  
12 for two hours?

13 A No. He was angry with me.

14 Q So he stayed about 45 minutes?

15 A Yes, sir.

16 Q What happened when he was at the motel?

17 A We had sex.

18 Q Do you remember anything he said to you that  
19 day, other than him being angry and to get your motels  
20 straight?

21 A I don't remember.

22 Q Do you remember anything you said to him on  
23 December 22nd --

24 A I don't --

25 Q -- while you were at the motel?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 193

1 Q So when was the next time you saw Dr. Kula  
2 after this December 29th office visit?

3 A I don't remember.

4 Q Did you ever meet him at the motel again?

5 A I met him again, but I don't remember the  
6 date.

7 Q Look at your --

8 A Can we look at the --

9 Q -- motel receipts.

10 Looks like there's a receipt here for January  
11 3rd, at Motel 6.

12 Would it be your testimony that that would be  
13 the next day you met him?

14 A Yes, sir. At the motel.

15 Q We don't have an office visit that day, so is  
16 it fair to say you didn't see him in the office before  
17 that January 3rd encounter at the motel?

18 A I don't know.

19 Q Do you recall any office appointment that  
20 day?

21 A I just don't remember.

22 Q Did you call Dr. Kula on January 3rd, which  
23 was a Wednesday, and suggest to him that you go get a  
24 motel room at the Motel 6?

25 A I don't remember.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 194

1 Q Do you remember calling Dr. Kula on  
2 Wednesday, January 3rd?

3 A No, I don't, but I may have.

4 Q You would have been off --

5 MR. WATTS: If you don't know, don't  
6 guess.

7 THE WITNESS: Oh, okay. I don't know.

8 Q (By Mr. McMillin) I guess you would have  
9 been off work that day, January 3rd?

10 A I don't know.

11 Q Had school started back yet?

12 A I have no idea. That was four years ago.

13 Q Well, how did it come about that you went and  
14 rented a motel room on January 3rd, at Motel 6?

15 A I have no idea.

16 Q Well, did you rent a motel room on January  
17 3rd?

18 A The paperwork's there. If it's there, I did.

19 Q Okay. Was it your suggestion or Dr. Kula's  
20 suggestion or somebody else's suggestion? Who  
21 suggested that?

22 A I don't remember.

23 Q Why did you rent a motel on January 3rd?

24 A More than likely, I met him there -- but I  
25 just don't recall it -- because that's the only time I

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 196

1 A Yes.

2 Q Right?

3 But any other occasions you remember Dr. Kula  
4 calling you at home?

5 A None.

6 Q Okay.

7 A I don't think he ever called me at home.

8 Q So if he didn't call you at home and you  
9 didn't have a cell phone, can we safely assume you  
10 called Dr. Kula on January 3rd?

11 A Yes.

12 Q And do you know what the -- the only reason  
13 you'd be calling him would be to see if he wanted to  
14 get together and meet you at the Motel 6 on January  
15 3rd.

16 Would there be any other reason you'd be  
17 calling him?

18 A I don't know.

19 Q Can you think of any other legitimate reason,  
20 knowing now that we have your motel receipt for that  
21 date?

22 A Not unless I was just feeling depressed. But  
23 I can't give you a good answer on it because I don't  
24 know.

25 Q Okay.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 199

1 look, it's Room 119, I believe. I asked for 118 and  
2 somebody had already checked in. Or maybe it was 118.

3 Q Let's talk about your therapy session in his  
4 office first.

5 A Okay.

6 Q Did you have the standard routine therapy  
7 session on January 15th?

8 A Yes, I did.

9 Q Okay. Nothing unusual or inappropriate  
10 happened during that therapy session?

11 A Just the normal kiss and hug and --

12 Q And that was at the end of the session?

13 A And that was at the end of every session,  
14 yes.

15 Q Okay. Other than that, do you remember any  
16 specifics that were discussed on January 15th, during  
17 the therapy session?

18 A No. Not to my knowledge right now, no, I  
19 don't remember.

20 Q Okay. Dr. Kula writes, in his January 15th,  
21 '01, note, that you're doing okay on your medications.

22 Is that your -- do you agree with that?

23 A I don't -- no, I don't remember how I was  
24 doing on my meds.

25 MR. WATTS: Again, we don't think that

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 203

1 A No, I don't.

2 Q And how long was it before Dr. Kula arrived?

3 A I don't have any idea.

4 Q How long did Dr. Kula stay at the Motel 6 on  
5 January 15th?

6 A I don't know. I left before he did.

7 Q Why did you leave before he did?

8 A I had this weird feeling that it would be the  
9 last time that I would be seeing him. And I told him  
10 that I wasn't going to be the last one to leave, that I  
11 was going to leave first, and so I left.

12 Q So why did you think it was the last time you  
13 were going to be seeing him? Because he was moving?

14 A No. I just had a -- I guess the old cliché,  
15 woman's intuition, but I just felt deep down that I  
16 wasn't going to see him again.

17 Q So was it before lunch or after lunch that  
18 Dr. Kula met you at this motel on January 15th?

19 A I don't remember.

20 Q Did Dr. Kula receive any phone calls on  
21 January 15th, while he was there at the motel with you?

22 A Yes, he did.

23 Q Who did he receive a phone call from?  
24 On his cell phone?

25 A On his cell phone.



**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 204

1 Q Did he answer it?

2 A Yes, he did.

3 Q Who was it?

4 A It was his secretary, J.R.

5 Q How do you know it was J.R.? He told you  
6 or --

7 A No. He picked it up and looked at it and  
8 said the number to me. And I said, that's the office  
9 number. And when he was talking to her, he called her  
10 J.R.

11 Q Were you in bed with him at that point, when  
12 the phone rang?

13 A Yes.

14 Q So he said, "That's J.R.," and he answered it  
15 and --

16 A Yes.

17 Q What did you hear?

18 A Well, what I gathered from the phone call was  
19 that his wife had called and that he needed to call his  
20 wife at home.

21 Q Okay. So it was a very brief conference with  
22 J.R. and him?

23 A Yes.

24 Q Less than a minute?

25 A I don't know how long it was. I don't even

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 205

1 want to guess.

2 Q Did he hang right up and then directly call  
3 his wife?

4 A He waited a few minutes and then called his  
5 wife.

6 Q From his cell phone?

7 A From his cell phone.

8 Q I guess you heard his end of the  
9 conversation?

10 A Yes, sir.

11 Q What did he say to her?

12 A Can I give you a summary?

13 Q Yes.

14 A Okay. Well, he -- what it boiled down to was  
15 the fact that -- something about her wanting to go to  
16 her mother's in Missouri, and that it was his  
17 daughter's birthday and he was supposed to pick up a  
18 cake somewhere. And she wanted to know how long it  
19 would be before he got home.

20 And I just kind of tuned them out then. And  
21 they talked for a few minutes and he hung up and -- and  
22 I got ready to leave.

23 Q Okay. So you heard Dr. Kula say something  
24 that -- on January 15th, it was his daughter's birthday  
25 and --

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 206

1 A Yes. He was supposed to pick up a cake and  
2 so...

3 Q Okay. Anything else you remember about that  
4 phone conference on January 15th?

5 A Not about the phone conference, I don't.

6 Q Okay. What else do you remember about the  
7 encounter at the motel that day, January 15th, that you  
8 haven't told me about?

9 A Okay. I remember -- this is very  
10 embarrassing. But I remember we were making love and  
11 he was trying to make me have an orgasm, and I was on  
12 top and he was on bottom, and he said there was a  
13 certain area up inside the woman that the penis could  
14 stimulate to have an orgasm, but the problem was he  
15 couldn't keep an erection.

16 Q Was that the only time that ever happened,  
17 was on January 15th?

18 A That he couldn't keep an erection?

19 Q Yes.

20 A No. It happened three other times.

21 Q So every time except for once, at the motel?

22 A Every time but twice. We were in the motel  
23 room five times.

24 Q Okay. So it happened three times, total?

25 A Yes.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 207

1 Q Anything else you remember him saying or him  
2 doing or that you recall about this January 15th, '01,  
3 encounter?

4 A No, sir. There's no other. Not that I  
5 recollect right now.

6 Q Was this January 15th, '01, the only time  
7 that Dr. Kula ever received a phone call while he was  
8 at the motel with you?

9 A Yes, sir.

10 Q Was that the only day he ever made any phone  
11 calls from his cell phone, while he was at the motels?

12 A That I know of, yes.

13 Q Well, you would have known if he was making  
14 calls from the motel, wouldn't you, unless he was  
15 making them in the bathroom?

16 A Unless I was in the bathroom, you know.

17 Q So did he stay about two hours on January  
18 15th, at the motel?

19 A I don't know, because I left first. I don't  
20 know how long he stayed after I left.

21 Q How long did you stay that day?

22 A I don't remember.

23 Q At least two hours?

24 A I don't know. After the phone call, I left.

25 Q Okay. And that was the last time you ever

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 208

1 rented a motel room with Dr. Kula?

2 A Yes, sir.

3 Q Did he give you any money for that motel room  
4 on January 15th?

5 A Yes, he did. He give me \$20.

6 Q So did he give you \$20 every time that you  
7 ever rented a room?

8 A No.

9 Q When did he --

10 A He did not pay for the Days Inn room at all.

11 Q Any reason?

12 A He was mad at me.

13 Q So he just didn't ever offer to give you any  
14 money?

15 A No, sir, he didn't.

16 Q It looks like the next office visit you had  
17 with Dr. Kula was January 26, '01.

18 Was that in his office in Ardmore?

19 A I don't -- I don't remember.

20 Q Did you ever visit him in Norman?

21 A Yes. Once, February the 9th.

22 Q Okay. So if you saw him on January 26th,  
23 then it would have been the one in Norman.

24 A In Norman.

25 Q Do you remember anything specific about the

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 209

1 therapy session you had with Dr. Kula on January 26th?  
2 Which was a Friday.

3 A No, sir, I don't.

4 Q Did anything unusual happen in that therapy  
5 session on January 26th?

6 A Just the normal hug and kiss.

7 Q And that happened at the end of the session,  
8 like you described before?

9 A Yes.

10 Q You hugged and kissed him back?

11 A Yes, I did.

12 Q Dr. Kula states in his January 26th, '01,  
13 note that "She had been calling me repeatedly, just  
14 wanting to talk, and I told her this isn't how it  
15 works."

16 Had you been calling Dr. Kula repeatedly?

17 A Not that I recall.

18 Q So had you called Dr. Kula between January  
19 15th, '01, when you saw him at Motel 6, and your next  
20 office visit on January 26th of '01?

21 A Honestly, I don't remember making any calls.

22 Q Okay. You hadn't called his office between  
23 that time frame?

24 A No.

25 Q Just that one time?

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 210

1 A Just that one time.

2 Q Okay.

3 A But I cannot honestly -- I just -- I just  
4 don't remember.

5 Q So it's possible you'd been calling  
6 repeatedly and you wouldn't remember that?

7 A I didn't call him repeatedly.

8 Q Well, that's what I'm asking you.

9 A Oh, I'm sorry. I'm just -- I must be getting  
10 tired.

11 No, I did not call him repeatedly; but yes, I  
12 may have called him once or twice.

13 Q You may have called him once or twice, but  
14 not repeatedly?

15 A Correct.

16 Q And he also states, "She's somewhat angry  
17 over the fact that I'm moving."

18 Is that true?

19 A No.

20 Q You weren't angry?

21 A I wasn't angry. I just -- like I said  
22 earlier, you know, I have to find another doctor that's  
23 willing to give me the medication, and that's very  
24 difficult to do and it makes you a little nervous.

25 Q And he states, "She said that every doctor

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 211

1 that she has ever had moves to get away from her."

2 Did you tell Dr. Kula that?

3 A No, sir, I didn't.

4 Q Did you talk to Dr. Kula between January 26th  
5 and the time you saw him in Norman on February 9th?

6 A I do not recollect. I don't know.

7 Q Did you make any calls to him during that  
8 time frame?

9 A I don't remember. I really don't.

10 Q You drove up to Norman on February 9th?

11 A Yes, sir, I did.

12 Q That was for a therapy session?

13 A Yes, sir, I did.

14 Q Was that the last therapy session you ever  
15 had with Dr. Kula?

16 A Yes, sir, it is.

17 Q Tell me what you remember about that February  
18 9th session.

19 A I'm having an anxiety attack.

20 Q Do we want to take a break?

21 A Huh-uh.

22 MR. WATTS: Take a break if you need to.  
23 Do you want to just relax for a couple of minutes? Why  
24 don't we do that.

25 THE WITNESS: Well, I want to get this



PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 212

1 over with.

2 MR. WATTS: Let's take a break for a  
3 minute.

4 (Short break)

5 Q (By Mr. McMillin) Okay. I think you were  
6 going to tell me about what you remember about this  
7 February 9th, '01, office visit with Dr. Kula, in  
8 Norman.

9 A Okay. When I went in there, he was very  
10 distant. His office was set up much like the one in  
11 Ardmore.

12 We got to talking and he told me that he  
13 couldn't see me anymore and that I was trash and that I  
14 was beneath him, if I were in his place, would I want  
15 to marry a blue collar worker or be with a blue collar  
16 worker.

17 And I told him if I loved that person, yes, I  
18 would. If I was a lawyer or doctor, whatever, yes, I  
19 would marry a blue collar worker. There's nothing  
20 wrong with that. And he told me that he was superior  
21 to me, that I was beneath him.

22 I was very hurt. I had become more involved  
23 than what I thought I had.

24 And he told me that his wife lived in Norman  
25 now and he didn't care if she caught him or not, that

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 213

1 if he got a divorce from her, that it didn't matter,  
2 that he would -- he wouldn't get married again anyway,  
3 but that he couldn't be with me because I was beneath  
4 what he was.

5 Q You weren't wanting to get involved in a  
6 permanent relationship with Dr. Kula, were you?

7 A No.

8 Q You were married, yourself.

9 A Right.

10 Q Anything else you remember Dr. Kula telling  
11 you on February 9th?

12 A Not that I recall. You know, just that --  
13 just what I told you, that I would -- I guess I'm going  
14 to repeat this. Just that I was beneath him, you know,  
15 that I didn't meet his standards.

16 Q So up until February 9th of '01, Dr. Kula had  
17 always been nice to you and courteous to you and never  
18 said anything mean to you, up until that point.

19 Is that true?

20 A That's true.

21 Q Okay. And so then you noticed something  
22 different on February 9th, where he was saying things  
23 to you for the first time, that hurt your feelings?

24 A Oh, yes.

25 Q Is that the first time --

**PATRICIA BACHHOFFER**  
**PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.**

Page 214

1           A     That's the first time he -- besides being  
2     angry -- you know, that upset me. But this was so  
3     hurtful that I had to sit in my car -- and I don't know  
4     how long I sat in my car -- and I cried.

5           Q     Now, did all this come out at the end of the  
6     therapy session?

7           A     No. That was the whole session, him  
8     explaining to me why he couldn't see me anymore and --

9           Q     Did he say he couldn't see you anymore as a  
10    patient or just in a personal relationship?

11          A     Just in a personal relationship.

12          Q     Okay. Did you tell him you thought that he  
13    had abandoned you by moving to Norman?

14          A     No, sir. Not that I recollect.

15          Q     Did you schedule an appointment before you  
16    left, to come back and see him on -- let's see -- did  
17    you come back for the next appointment on February 23rd  
18    of '01?

19          A     No, sir, I didn't.

20          Q     You never had any appointments with Dr. Kula  
21    after February 9th of '01?

22          A     No, sir.

23          Q     So do you know why his record shows an  
24    appointment February 23rd, and it shows canceled?

25          A     I made the appointments but I never showed up

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 230

1 MR. WATTS: He didn't ask you why. He  
2 just asked you what was his take on it. What did your  
3 husband say?

4 THE WITNESS: Well, that's what I was  
5 fixing to tell.

6 MR. WATTS: Okay. I'm sorry. I'm sorry.  
7 Go ahead.

8 THE WITNESS: No. I may be saying the  
9 wrong thing.

10 Q (By Mr. McMillin) That's essentially what I  
11 want to know. What -- what --

12 A What my husband said?

13 Q Yeah.

14 A He told me that he would support me in  
15 anything I decided to do, and that the best thing to do  
16 would be to try to prevent this from happening to any  
17 other woman that has disorders or disabilities worse  
18 than I do.

19 Q Okay. Now, you knew what you were doing when  
20 you were having an affair with Dr. Kula, though, didn't  
21 you?

22 A I do now.

23 Q Well --

24 A I didn't then.

25 Q Oh. So when you met him at the motel on

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 231

1 these five times, you're telling us under oath that you  
2 didn't know you were having an extramarital affair with  
3 a man you weren't married to?

4 A Oh. No. I knew I was doing it.

5 Q Okay. So you're telling us under oath --

6 MR. WATTS: Let her finish.

7 Go ahead.

8 THE WITNESS: I'm trying to explain. At  
9 that time in my life, I was low self-esteem, no  
10 confidence, my husband and I were not getting along.  
11 Dr. Kula gave me the attention that I needed. He  
12 offered himself to me to make my marriage better by  
13 having an affair, and that's why I did it.

14 I look back now and I know and I see how  
15 wrong it was; but then I could not see it. All I could  
16 see was this man cares for me, he thinks I'm beautiful,  
17 he builds my self-esteem, my self-confidence.

18 Q (By Mr. McMillin) But you knew your having  
19 an affair was wrong, didn't you?

20 A Well, I did. I'm not going to say I didn't.  
21 I did. But he gave me what I needed, that I didn't get  
22 at home.

23 Do you understand?

24 Q I understand what you're saying, yes.

25 A Okay. Thank you.

PATRICIA BACHHOFFER  
PATRICIA BACHHOFFER v. G. PAUL KULA, M.D.

Page 257

1 lost with me.

2 Q I think you testified at that licensure  
3 hearing, or maybe it was in your prior hearing, the  
4 time you went to Days Inn, you splurged on a king-size  
5 bed?

6 A Yes.

7 Q Was the king-size bed room -- did it cost  
8 more than the other rooms there at the Days Inn?

9 A I don't know. I didn't ask.

10 Q Now, all the sexual contact and sexual  
11 relationship you had with Dr. Kula were all consensual;  
12 is that right?

13 A Yes.

14 Q And I understand you accept part of the blame  
15 for having an affair with Dr. Kula, don't you?

16 A Yes, I do.

17 Q Were you in any way delusional at any time  
18 that you were seeing Dr. Kula?

19 A No, I wasn't.

20 MR. WATTS: I'm going to object to the  
21 form of that as calling for a medical conclusion.

22 Q (By Mr. McMillin) Did you ever tell Dr. Kula  
23 that your biggest fear was that he would move away?

24 A Excuse me?

25 Q Did you ever tell Dr. Kula that one of your